

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PLATINUMTEL COMMUNICATIONS, )  
LLC, )  
                                  )  
Plaintiff, )                                No. 08 CV 1062  
                                  )  
vs. )                                Judge JOAN H. LEFKOW  
                                  )  
ZEFCOM, LLC d/b/a TELISPIRE, )  
TELISPIRE, INC, et al, )  
                                  )  
Defendants. )

**DEFENDANTS U.S. MOBILE, INC. AND RAMSEY NATOUR'S MOTION TO  
DISMISS PLATINUMTEL'S AMENDED COMPLAINT,  
AND LEAVE TO FILE MEMORANDUM OF LAW**

NOW COMES the Defendants U.S. MOBILE, INC., and RAMSEY NATOUR, individually and d/b/a U.S. Mobile, et al., ("U.S. MOBILE and NATOUR"), by and through their attorneys, Thomas F. Courtney & Associates, P.C., and respectfully moves this Court pursuant to Fed. R. Civ. P. 9(b)(6) to enter an order dismissing with prejudice each of the claims asserted against U.S. MOBILE and NATOUR by plaintiff, PlatinumTel Communications, LLC ("PlatinumTel") in Count I through V of the Amended Complaint. PlatinumTel's claims against Defendants should be dismissed because Counts I-V fails to state a claim upon which relief may be granted. In addition, each Count is based upon alleged fraud, and PlatinumTel has failed to plead any of the Count(s) with specificity required under Rule 9(b). In support of this motion, Defendants pray for leave to file a memorandum of law.

**WHEREFORE**, Defendants, U.S. Mobile and Ramsey Natour, individually and d/b/a U.S. Mobile et al., respectfully request that Counts I-V of the Amended Complaint be dismissed with prejudice, with leave to file a memorandum of law in support thereof, instanter.

Respectfully submitted,

By: s/ Thomas F. Courtney, Jr.  
One of its Attorneys

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**CERTIFICATE OF SERVICE**

I, Thomas F. Courtney, Jr., an attorney, certify that on May 21, 2008, I caused a copy of the foregoing Motion to Dismiss to be served by ECF to:

By: s/ Thomas F. Courtney, Jr.

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